#### STATE OF WASHINGTON



# INSURANCE COMMISSIONER

	)
In the Matter of	) No. G 2000 - 17
	)
The Market Conduct Examination	) FINDINGS, CONCLUSIONS, AND
of Northwestern Mutual Life Insurance	) ORDER ADOPTING REPORT
Company.	)
	)

## BACKGROUND

An examination of the market conduct of Northwestern Mutual Life Insurance Company (the Company) for the period January 1, 1992, to December 31, 1996, was conducted by market conduct examiners of the Washington State Office of the Insurance Commissioner. The Company is an insurer authorized under RCW 48.05.030. This examination was conducted in compliance with the laws and regulations of the State of Washington and in accordance with the procedures promulgated by the National Association of Insurance Commissioners and the Office of the Insurance Commissioner. This examination was limited to Marketing and Sales Practices, Complaint Handling, and Replacement activity.

The examination report with the findings and recommendations was transmitted to the Company for their comments on January 31, 2000. Response to the draft report was received on March 1, 2000.

The Commissioner or a designee has considered the report, the relevant portions of the examiner workpapers, and the submission by the Company. The report was modified to reflect new information provided by the company in their response to the draft report.

Subject to the right of the Company to demand a hearing pursuant to chapters 48.04 and 34.05 RCW, the Commissioner adopts the following findings, conclusions, and order.

### **FINDINGS**

The Commissioner adopts as findings the findings of the examiners as contained in the report.

#### **CONCLUSIONS**

It is appropriate and in accordance with law to adopt the attached examination report as the final report of the market conduct of the Company.

### **ORDER**

The examination report as filed, attached hereto and incorporated by reference, is hereby ADOPTED as the final examination report.

It is ORDERED that the Company comply with the Instructions in the Report as follows (the page and other references are to the report):

- 1. The Company is in violation of RCW 48.17.060 and is instructed to make certain all agents are licensed with the State of Washington prior to soliciting applications on behalf of the Company. (Page 13).
- 2. The Company is in violation of 284-23-440(2)(a) and is instructed to require replacement forms be completed at the time the application is taken. (Page 16).
- 3. The Company is in violation of WAC 284-23-455(b) and is instructed to send the replacement notification to the existing insurer with three (3) working days of receipt of the application in the home office. (Page 16)

ENTERED at Lacey, Washington, this 13<sup>th</sup> day of March, 2000.

DEBORAH SENN

**Insurance Commissioner** 

By:

WILLIAM E. FRANDSEN

**Deputy Commissioner**